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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Monica E. Ramirez Hernandez,  
Plaintiff,

vs.

Cardenas Markets, LLC; Lamanza, LLC; Doe Store  
Managers I through X; Doe Store Employees I  
through X; Doe Owners 1 through X; Doe Property  
Managers I through X; Doe Maintenance Employees  
I through X; Doe Janitorial Employees I through X;  
Roe Property Managers XI through XX; Roe  
Maintenance Companies XI through XX; Toe  
Owners XI through XX; Roe Employees XI through  
XX; Does XXI through XXC; Roe Corporations  
XXC through XXX, inclusive, jointly and severally,  
Defendant.

Case No.: 2:23-CV-799

**Amended Proposed Stipulated  
Discovery Plan and Scheduling Order;  
Submitted in Compliance with LR 26-  
1(b)**


**SPECIAL SCHEDULING REVIEW  
REQUESTED**

1. **Meeting:** The parties conducted the Rule 26(f) conference on June 1, 2023.
2. **Pre-Discovery Disclosures:** The parties have not yet served their Rule 26(a)(1) disclosures.
3. **Discovery Plan:** The parties propose the discovery period below, calculated from Cardenas Markets, LLC and Lamanza, LLC's May 22, 2023 Petition for Removal. The parties request additional time because of the nature of Plaintiff's injuries. Plaintiff alleges a number of injuries for her lower and upper back. She is still treating, receiving pain management and

chiropractic care. Plaintiff may allege the need for surgery. Thus the parties request an additional 90 days.

Amending the Pleadings and Adding Parties	November 17, 2023
Initial Expert Disclosures & Interim Status Report	November 17, 2023
Rebuttal Expert Disclosures	December 15, 2023
Discovery Closes	February 16, 2024
Dispositive Motions	March 15, 2024
Pre-Trial Order, if no Dispositive Motions	April 12, 2024

The parties certify that they have conferred about the possibility of using alternative dispute resolution processes, but concluded they are not mutually beneficial at this time. The parties also considered consent to trial by a magistrate judge and the use of the Short Trial Program. Further, the parties have discussed electronic evidence, but to date have no electronic evidence to present other than video of the fall.

 <b>WILSON ELSE</b> <small>WILSON ELSER MOSKOWITZ FIDELMAN &amp; DICKER LLP</small> <u>/s/ Jonathan C. Pattillo</u> Michael P. Lowry, Esq. Nevada Bar No. 10666 Jonathan C. Pattillo, Esq. Nevada Bar No. 13929 Attorneys for Cardenas Markets, Inc.; Lamanza, LLC	<b>BIGHORN LAW</b>  <u>/s/ Joshua P. Berrett</u> Kimball Jones, Esq. Nevada Bar No. 12982 Joshua P. Berrett, Esq. Nevada Bar No. 12697 Attorneys for Monica Ramirez Hernandez
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### **ORDER**

**IT IS SO ORDERED.**

DATED: June 5, 2023



UNITED STATES MAGISTRATE JUDGE

**Certificate of Service**

Pursuant to NRCP 5, I certify that on June 2, 2023, I served **De Proposed Stipulated  
Discovery Plan and Scheduling Order; Submitted in Compliance with LR 26-1(b)**  
as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

Bighorn Law 3675 W. Cheyenne Ave. Suite 100 North Las Vegas, NV 89032 Attorneys for Plaintiff	
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BY: Mary Ann Tuer  
An Employee of Wilson Elser Moskowitz Edelman  
& Dicker, LLP